

In The United States District Court
For The District Of Delaware

Shane K. Hopkins,
Plaintiff,

C.A. NO. 05-870-SLR

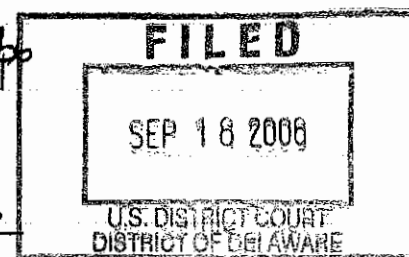
v.

John Pusey, et al.,
Defendants.

Rule 34

Scanned- BD 9/18/06

Plaintiff's First Request
For Production Of Documents



Now Comes the plaintiff Shane Hopkins pursuant to Rule 34 of the F.R.C.P. herein requests that the defendants provide him with certified copies of the following documents:

ACLU defendants

(a) All investigative reports done by the ACLU as a result of plaintiff's October 10, 2002 submission concerning an assault upon him by correctional officers and condition of confinement;

(b) All investigative reports done by the ACLU as a result of plaintiff's July 9, 2005 submission concerning an assault upon him by prison officer. (See related submission attached to plaintiff's complaint as Exhibit "D").

(c) All investigative reports conducted by F.B.I agent Brenda Wise regarding the upon plaintiff and continued ongoing instance of assaults upon other Delaware Correctional Center (DCC) inmates;

(d) All submissions contained in ACLU's File # 02-22 regarding complaints of use of excessive force upon inmates by prison officers in the Department of corrections (DOC).

M. Jane Brady

(e) Copies of any reports of assaults forwarded to her office for prosecution (these reports relate to the pattern of assaults upon DOC prisoners by guards).

(f) Any investigative reports done as a result of certified mail forwarded to defendant Brady's office on July 7, 2005. (See Attachment to plaintiff's complaint Exhibit "E").

(g) Copies of reports submitted for prosecution by ACLU.

Deputy Warden

(h) All investigative reports conducted by the Warden's office under the directions of defendant Deputy Warden Pierce in relationship to Grievance Complaint (case # 9907) for unnecessary use of excessive force by two officers. (See Grievance Complaint Exhibit "A" to plaintiff's original complaint);

(j) Copy of policy and procedures for assigning inmates to double-bunk cells. It will be sufficient to just admit whether or not it is the policy and practice of DCC to house two inmates in a cell together whom obviously have a serious conflict with each other. This admission shall include a separate statement whether or not it is the policy to separate two inmates once it is known by staff of a ongoing conflict between those inmates.

Grievance Officer Lise Merson

(k) Copies of investigations conducted for Grievance Complaint #9907 ;

(l) Copies of Rules for Filing grievance while in isolation (i.e., procedures which allow inmates to obtain pen, paper, grievance forms, etc., to construct and submit a properly filed grievance within 7-days).

Defendants Pusey and Smith

(m) All incident reports submitted by DCC officers concerning the November 26, 2002 incident and use of force upon plaintiff by defendants Pusey and Smith;

(n) Copies of photographs taken of the plaintiff's injuries ;

(o) Copy of the medical reports taken by DCC nurse after the incident ;

(p) Copy of building 22 Log book covering the dates and time of this November 26, 2002 incident

which will identify potential witnesses hereto ;

(Q) List of the names of inmates housed on the tier with plaintiff at the time of this incident who may be potential material witnesses in any future trial or that may be interviewed to obtain sworn Affidavits ;

(r) Provide a list of the names of the correctional officers that worked in building 22 and 24 the day of this incident ;

(s) Copies of any reports prepared by Internal Affairs concerning this assault incident ; and

(t) Copies any and all medical reports regarding any injuries sustained by any correctional officer during the November 26, 2002 incident.

Date: Sept. 13, 2006

Thank You!

Shane Hopkins

Shane Hopkins

Delaware Correctional Ctr.

1181 Paddock Road

Smyrna, Delaware 19977

Certificate of Service

I, SHANE K. HOPKINS, hereby certify that I have served a true
and correct cop(ies) of the attached: MOTION FOR DISCOVERY AND
INTERROGATORIES upon the following
parties/person (s):

TO: LISA BARCHI
DEPUTY ATTORNEY GENERAL
DEPT. OF JUSTICE
820 N. FRENCH ST 6TH FLOOR
WILMINGTON DE 19801

TO: _____

TO: John W. Shaw
The Brandywine Building 17TH FL.
1600 West Street
Wilmington, Delaware
19899-0391

TO: _____

BY PLACING SAME IN A SEALED ENVELOPE and depositing same in the United
States Mail at the Delaware Correctional Center, 1181 Paddock Road, Smyrna, DE
19977.

On this 15 day of Sept., 2006

Shane Hopkins

171 SHARLE HOPKINS

SBI# 233916 UNIT # 21

DELAWARE CORRECTIONAL CENTER

1181 PADDOCK ROAD

SMYRNA, DELAWARE 19977

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